

YUCCA MOUNTAIN SITE CHARACTERIZATION OFFICE  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy M/S 010  
P.O. Box 30307  
North Las Vegas, NV 89036-0307

RECEIVED

JAN 03 2000

Attention: Wendy Dixon, EIS Manager

Subject: Draft Environmental Impact Statement for a Geologic Repository  
for the Disposal of Spent Nuclear Fuel and High-Level Radioactive  
Waste

Dear Wendy Dixon,

1 When Congress amended the Nuclear Waste Policy Act in 1987, they designated Yucca Mountain, Nevada, as the only site to be considered as a high-level nuclear waste repository, removing all other sites, which until then, were also under consideration. The reasons were political rather than scientific or technical. Yucca Mountain lies within the most earthquake-prone region of the country, which alone should have disqualified it from consideration long ago. However, because Nevada has only two representatives and two senators in Congress, we were an easy target for members of Congress representing more powerful states also under consideration for a repository.

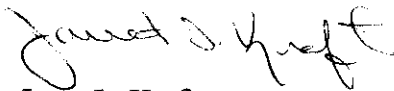
Even more troubling than the politically-based nature of the decision to target Nevada alone for high-level waste, is the fact that to help insure approval of the site, Congress undermined key provisions of the National Environmental Policy Act with respect to the Yucca Mountain project. NWPA limited the scope and extent of the evaluation of potential environmental impacts normally required in an environmental impact statement under NEPA.

In other words, Congress has significantly diminished the inherent value of conducting an environmental impact statement, in an apparent attempt to rubber-stamp NEPA approval on the project.

2 The proposed Nuclear Waste Policy Act of 1997, contains similar provisions gutting environmental laws and regulations with respect to nuclear waste transportation and storage. Knowing that this project could never meet radiation guidelines established by the NEPA and other regulatory agencies charged with protecting our health and safety, Congress has included in the bill broad, sweeping exemptions from local, state, or federal environmental oversight of the transportation and storage process. For example, it prevents EPA from creating environmental standards governing the Yucca Mountain site, and raises limits on the amount of radiation in the drinking water near Yucca Mountain to a level 25 times higher than at any other site. It prohibits the EPA from promulgating a repository radiation standard and sets a Congressionally mandated radiation standard of 100 millirems. This standard also preempts the Safe Drinking Water Act and equates to a lifetime cancer risk of one excess death for every 286 individuals exposed.

- 3 The reactors where the waste is now stored are licensed by the NRC and are on solid, stable ground with negligible earthquake activity. By contrast, the area where they propose to ship the waste is among the most seismically active in the country and would not meet the same NRC licensing standards for reactors. Since site characterization studies for the Yucca Mountain dump began, there have been dozens of earthquakes, including a magnitude 5.2 quake in 1992 which caused over a million dollars in damage to government buildings at the Yucca Mountain site. There have been 621 seismic events of a 2.5 magnitude or greater in the last 20 years.
- 4 The hundred years in which dry-cask storage remains a safe alternative is plenty of time to review our current policies and be sure that our solution to this difficult, politically volatile problem is the right one.

Regards,



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